

UNITED STATES DISTRICT COURT

for the

Southern District of Indiana

United States of America

v.

TRENT WALKER

Case No. 3:19-mj-00091-MPB

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 11, 2019 in the county of Spencer in the
Southern District of Indiana, the defendant(s) violated:

Code Section

Offense Description

Count 1: 18 U.S.C. § 2251(a)

Sexual Exploitation of a Child (Minor Victim 1)

Count 2: 18 U.S.C. § 2252A(a)(5)
(B)

Possession of Child Pornography on or about 08.09.2019

This criminal complaint is based on these facts:

See Attached Affidavit.

☒ Continued on the attached sheet.



Complainant's signature

Andrew D. Willmann, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 08/13/2019



Judge's signature

City and state: Indianapolis, Indiana

Tim A. Baker, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF APPLICATION

I, Andrew Willmann, a Special Agent with the FBI, hereby depose and state as follows:

1. **Affiant:** I am a Special Agent with the Federal Bureau of Investigation, and have been since June 2014. I have taken classes related to cyber-criminal activity as well as classes related to the exploitation of children. I have also investigated numerous crimes against children since being assigned to the Indianapolis Field Office. I am currently assigned to the Indianapolis Violent Crimes Against Children Task Force. I have completed five months of training at the FBI Academy in Quantico, Virginia, and attended the Dallas Crimes Against Children Conference.

2. **Requested action:** I make this affidavit in support of a Criminal Complaint and Arrest Warrant charging TRENT WALKER with **Count 1: Sexual Exploitation of a Child (Minor Victim 1)**, sometime on or before August 11, 2019, in violation of Title 18, United States Code, Section 2251(a); and **Count 2: Possession of Child Pornography**, on or about August 11, 2019, in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

3. **Sexual Exploitation of a Child/Attempted Sexual Exploitation of a Child:** This statute provides that "Any person who employs, uses, persuades, induces, entices, or coerces any minor to engage in, or who has a minor assist any other person to engage in, or who transports any minor in or affecting interstate or foreign commerce, or in any Territory or Possession of the United States, with the intent that such minor engage in, any sexually explicit conduct for the purpose of

producing any visual depiction of such conduct or for the purpose of transmitting a live visual depiction of such conduct, shall be punished as provided under subsection (e), if such person knows or has reason to know that such visual depiction will be transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or mailed, if that visual depiction was produced or transmitted using materials that have been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer, or if such visual depiction has actually been transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or mailed.” 18 U.S.C. § 2251(a). It is also a crime to attempt to sexually exploit a child. 18 U.S.C. § 2251(e).

4. **Possession of Child Pornography:** This statute, in pertinent parts, prohibits a person from knowingly possessing 1 or more books, magazines, periodicals, films, video tapes, or other matter which contain any visual depiction that has been mailed, or has been shipped or transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, or which was produced using materials which have been mailed or shipped or transported by any means, including by computer, if the producing of such visual depiction involves the use of a minor engaging in sexually explicit conduct and such visual depiction is of such conduct. Title 18, United States Code, Section 2252A(a)(5)(B).

5. **Definitions:** The following definitions apply to this Affidavit:

6. “Child Pornography” means any visual depiction of sexually explicit conduct where (a) the production of the visual depiction involved the use of a minor engaged in sexually explicit conduct, (b) the visual depiction is a digital image, computer image, or computer-generated image that is, or is indistinguishable from, that of a minor engaged in sexually explicit conduct, or (c) the visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaged in sexually explicit conduct. See 18 U.S.C. § 2256.

7. “Minor” means any person under the age of eighteen years. See 18 U.S.C. § 2256(1).

8. “Sexually explicit conduct” means actual or simulated (a) sexual intercourse, including genital-genital, oral-genital, or oral-anal, whether between persons of the same or opposite sex; (b) bestiality; (c) masturbation; (d) sadistic or masochistic abuse; or (e) lascivious exhibition of the genitals or pubic area of any person. See 18 U.S.C. § 2256(2).

9. “Visual depictions” include undeveloped film and videotape, and data stored on computer disk or by electronic means, which is capable of conversion into a visual image. See 18 U.S.C. § 2256(5).

10. **Information provided:** The statements in this affidavit are based in part on information provided by other law enforcement officers and my own observations. Because this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included each and every fact known to me

concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause that to believe that TRENT WALKER committed the above-listed offenses.

OVERVIEW OF SPECIFIC PROBABLE CAUSE

11. **Background of the Investigation:** TRENT WALKER is a resident of 232 W. County 100 South, Rockport, Spencer County, Indiana 47635, which is in the Southern District of Indiana.

12. Minor Victim 1 is Individual A and WALKER's [REDACTED], and is approximately seven years' old. Individual A and WALKER are divorced, and [REDACTED] of Minor Victim 1.

13. Individual B resides with WALKER at 232 W. County 100 South, Rockport, Spencer County, Indiana 47635.

14. On August 11, 2019, at approximately 7:20 AM, officers received a complaint by Individuals A and B that TRENT WALKER had molested Minor Victim 1. Officers met with Individuals A and B at the Spencer County Sheriff's Office, and after a short debrief, traveled to the Rockport Police Department to interview Individuals A and B.

15. According to Individual B, she has lived with WALKER at 232 W. County 100 South, Rockport, Indiana, for approximately 2 years, and they have been in an "off and on" romantic relationship for approximately 13 years. According to Individual B, at approximately 4:40 AM on August 11, 2019, she was going through WALKER's cellphone while he slept beside her because she believed WALKER was

cheating on her. According to Individual B, she knew WALKER's phone password to be "6666" and accessed his phone. Individual B went through WALKER's text messages and the photo gallery stored his Samsung Galaxy S7. The cellular phone has an IMEI of 359775072061553.

16. According to Individual B, she observed images of WALKER's [REDACTED], Minor Victim 1, naked on Minor Victim 1's bed. Individual B showed officers ten images and two videos that Individual B took by using her own phone to capture some of the images and videos she had observed on WALKER's phone before his cellphone battery died.

17. One of the images that Individual B showed officers depicted Minor Victim 1, nude, with her legs spread. There was semen on Minor Victim 1's vagina and WALKER's penis was shown on Minor Victim 1's body. Two photographs depicted WALKER placing his finger into Minor Victim 1's anus, and a third photograph depicted Minor Victim 1 with her hand on WALKER's penis. Further, a video depicted Minor Victim 1 kissing WALKER's penis with semen on it, and a second video showed WALKER rubbing his penis on the inside and outside of Minor Victim 1's vagina. There were a total of at least 10 images and 2 videos.

18. Individual B told officers that Minor Victim 1 was seven years' old and that Individual B could readily identify her in the photographs and videos. According to Individual B, she believes that some of the images were produced on August 8, 2019, in Minor Victim 1's bedroom due to the clothing that Minor Victim 1 was

wearing and because she knows that WALKER had [REDACTED] with Minor Victim 1 that day.

19. Additionally, Individual B was able to identify the bedsheets and covers on Minor Victim 1's bed as being those [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED].

20. According to Individual B, she could also readily identify WALKER as being the other person in the images and videos because he has a unique hair line on his stomach, distinctive hands, and because she recognized the pants he was wearing. According to Individual B, WALKER often wore those pants, and they were blue sweatpants with Hollister in white lettering down the side. According to Individual B, no one was present at the residence on August 8, 2019 besides herself and WALKER.

21. Individual B showed officers a naked photograph of WALKER that WALKER had sent to Individual B approximately one year ago. The photograph of WALKER depicted the same distinct hair pattern on his stomach as shown in the above-described images and videos with Minor Victim 1.

22. Individual B was also able to identify WALKER's penis because they had been in a sexual relationship for approximately 13 years. According to Individual B, she was able to identify WALKER's penis because it has a small birthmark on the top of it.

23. According to Individual B, WALKER was very knowledgeable with computers and had commented that he would destroy evidence if he became aware

that she had spoken to officers. According to Individual B, WALKER had told her that he used security measures to protect his phone and personal computer.

24. Officers also interviewed Individual A, Minor Victim 1's mother. According to Individual A, she was in a sexual relationship with WALKER for approximately two years while they were married.

25. Individual A identified both Minor Victim 1 and WALKER in the images saved by Individual B. Individual A confirmed that WALKER has distinctive hands and a unique hair line on his stomach.

26. Individual B gave WALKER's Samsung Galaxy S7 with IMEI 359775072061553 to Spencer County Sheriff's Department officers.

Officers Execute a Search Warrant and Interview WALKER

27. On or about August 11, 2019, Spencer County Sheriff's Deputies obtained authority from the Spencer Circuit Court to search WALKER's residence at 232 W. County 100 South, Rockport, Spencer County, Indiana 47635.

28. During the execution of the search warrant, officers entered the residence and observed numerous devices, such as computers, onto which data such as images and videos could be saved. Officers observed that one computer was operating QUBES, an operating system that anonymizes users over the Internet.

29. Officers read WALKER his *Miranda* rights, which he waived in writing. WALKER agreed to be interviewed by officers.

30. During the interview, WALKER admitted the molesting Minor Victim 1 for at least four years. WALKER further admitted to producing and distributing

images and videos of Minor Victim 1 engaged in sexually explicit conduct. WALKER further admitted that devices such as his computer and one or two of his cellular phones contained images and videos depicting Minor Victim 1 engaged in sexually explicit conduct. According to WALKER, he used at least one cellular phone to produce the images and videos of Minor Victim 1. WALKER claimed that while molesting Minor Victim 1, he performed oral sex on Minor Victim 1, and claimed that the first time he touched Minor Victim 1 with his penis was the week prior to the search warrant.

Federal Officers Take Custody of Devices Found on WALKER and in WALKER's Residence Recovered by the Spencer County Sheriff's Department

31. Federal officers took custody of, but did not search, the devices recovered by the Spencer County Sheriff's Department from WALKER's person and WALKER's residence pursuant to the local search warrant obtained by the Spencer County Sheriff's Department from the Spencer County Circuit Court 1.

32. The Spencer County Sheriff's Department is still in possession of the Samsung Galaxy S7, IMEI 359775072061553.

33. On August 12, 2019, federal agents obtained the authority to search the devices recovered from the Spencer County Sheriff's Department on WALKER's person and at his residence from the Honorable Tim A. Baker, United States Magistrate Judge, in the Southern District of Indiana.

34. Agents are obtaining authority to search WALKER's Samsung Galaxy S7, IMEI 359775072061553, and have neither seized nor searched the phone.

35. Between on or about August 12, 2019, and on or about August 13, 2019, agents executed the federal search warrant on WALKER's devices, including WALKER's computer that was seized from his residence.

36. During a preliminary forensic review, agents observed the following on WALKER's computer:

- a. Cap_20170228_215043_00:00:38_06.jpg: This image file appears to be a screen capture of a video. It depicts what appears to be WALKER's face next to a minor female's vagina. The girl's underwear are pulled to the side exposing her vagina. WALLER tongue is near her vagina. The female's face is not visible.
- b. Cap_20170228_215043_00:01:01_76.jpg: This image file appears to be a screen capture of a video. It depicts the side of an adult male's face. His tongue is touching the vagina of a prepubescent, minor female. The female's face is not visible.
- c. Cap_20170228_220638_00:00:49_05.jpg: This image file appears to be a screen capture of a video. It is a close-up of a prepubescent, minor female's vagina. Her underwear are pulled to the side and an adult male's erect penis is inside of her vagina.

37. Based on my training and experience, the images and videos observed on WALKER's computer depict sexually explicit conduct of a prepubescent minor and are child pornography.

38. Agents are still conducting forensic searches on WALKER's devices, including WALKER's computer, and the investigation is ongoing.

39. **Interstate or foreign commerce:** The devices used to store the videos were manufactured outside of the State of Indiana or contain parts that were manufactured outside of the State of Indiana, and therefore, travelled in interstate or foreign commerce.

40. **Conclusion:** Based on my training and experience, and the facts as set forth in this affidavit, there is probable cause to believe that TRENT WALKER has committed the listed offenses, namely production and possession of child pornography in violation of Title 18, United States Code, Sections 2251(a) and 2252A(a)(5)(B).



Andrew D. Willmann
Special Agent
Federal Bureau of Investigation

Subscribed and sworn before me this 13th day of August, 2019.



Tim A. Baker
United States Magistrate Judge
Southern District of Indiana